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# **WorkFirst Improvement Project**

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WorkFirst Improvement Team  
Recommendations

## Background

In August 2002 approximately 3,200 people will have been on Temporary Assistance for Needy Families (TANF) for 60 months and could, under federal and state law, no longer be eligible for assistance. Federal law allows states to extend TANF benefits beyond the time limit to 20 percent of their caseload. Criteria for these “hardship extensions” are left up to the states. Washington’s 20 percent limit is estimated to be about 11,000 cases.

On November 6, the Governor announced the extension of TANF benefits with strengthened accountability standards for families participating in the state’s WorkFirst program.

The new time limits policy will:

- Exempt some clients who are not able to actively participate – the disabled, older adults, and those caring for disabled children or other vulnerable adults.
- Continue to help those who are playing by the rules and are participating between 32 and 40 hours each week even after 60 months on TANF.
- Disqualify adults who don’t cooperate fully and have received benefits for 60 months. These families will only qualify for Child SafetyNet Payments.

## Guiding Principles

- Full, active participation leads to employment and self-sufficiency.
- Regular information on a client’s participation status will enhance participation and needed client supports.
- Individual client needs and circumstances should be continually identified & addressed.
- Refusal to participate without good cause will result in sanctions.
- Simplification and system improvements will increase program accountability and consistency.

## Workgroups and Workgroup Charges

As a result of the Governor’s decision, the WorkFirst Improvement Team (WIT) was organized into five workgroups, composed of frontline staff, local managers, and headquarters staff, from the partner agencies to

develop policy and operational recommendations to implement the Governor's directive. The charges of the workgroups are described below.

### **Participation**

- Define full-time participation and activities that meet the definition
- Examine current policy to determine how the time limits decisions affect participation policy
- Tie participation requirements to the sanction policy and process
- Consider client flow from activity to activity
- Strengthen monitoring and reporting of participation by service providers

### **Sanctions & Child SafetyNet Payments**

- Promote client accountability and work readiness while recognizing and responding to individual client needs and changing circumstances
- Define sanction policy and process that is clear and straightforward enough for clients, case managers, WorkFirst partners and other parties to readily understand
- Define Child SafetyNet Payment policy and process that is distinct from sanctions
- Automate the process wherever possible to increase timeliness, consistency and effectiveness

### **Protective Payees**

- Determine whether there are enough payees to handle the anticipated increase in clients who will be assigned a payee under the strengthened sanction policy
- Review the current responsibilities of payees and determine whether or not changes will be needed to effectively administer the new policy
- Assess and improve the protective payee system, including simplification and streamlining the process

### **Child SafetyNet Assessments (Note: the assessment/inventory was determined to be unneeded)**

- Determine need and purpose of Basic Needs Inventory

### **Time Limit Extensions**

- Define exemption and extension categories, length of review period, and how to determine who belongs in which category

## Section

# 2

# What is Participation?

## Introduction

The Full-Time Participation workgroup focused its energy on finding ways to improve the WorkFirst system of services to ensure participants are participating continuously in full-time activities throughout their stay on TANF. From its research, the workgroup found that there is room for improvement in relationship to the activities and services provided, in engaging clients and moving them through the services into employment, and in the tracking systems and processes that document participation.

The recommendations of the workgroup regarding participation follow.

## Full-time Participation

As in the current program, Job Search is the first activity for almost all participants, with the exception of those dealing with crisis situations. The labor market is the indicator of employability and/or the need for other activities. Post-employment activities will remain available to those who enter employment of at least 20 hours per week to help them stay on the job and move up the wage ladder.

Full-time participation has been defined as up to 40 hours per week, with a minimum of 32 hours per week. Participants will be engaged in continuous activities as long as they remain on TANF.

There are several activities that are considered stand-alone full-time participation. Strong standards for these activities will be established and approved by Sub 3<sup>1</sup>. Service providers will be required to provide services according to the standards and certify on a monthly basis that clients are participating full-time. The standards for service providers will require them to fully engage clients, ensure that there are no periods of time when clients are not participating, and provide activities and services that are meaningful.

Stand-alone full-time activities are:

- Full-Time Employment
- Full-Time Job Search
- Pre-Employment Training, High Wage/High Demand training, Full-Time Seasonal Worker training
- In-patient drug/alcohol treatment
- Intensive out-patient treatment

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<sup>1</sup> Sub 3 is the WorkFirst SubCabinet committee charged with operationalizing and monitoring the WorkFirst program. Contact Theresa Mercedes-Hess at [tmercedes-hess@esd.wa.gov](mailto:tmercedes-hess@esd.wa.gov) for more information.

- Full-Time participation with DVR, or other experts assisting clients with disabilities
- Activities to resolve crisis situations (will be individually defined to meet the immediate needs.)

The program assumes that clients will still be able to participate, even during lengthy periods of time they may be on a waiting list for a particular service or provider, such as DVR. Case managers, in consultation with other WorkFirst staff and experts will find the best level of participation and activities the client can engage in while they are waiting. For example, most clients who need DVR can work part-time in an entry-level job while waiting for the services that will help them obtain career employment.

Sub3 will also establish a list of activities that can be added to a participant's IRP after he or she has fully participated in job search without finding a job, based on the WorkFirst Standards indicated in this document, such as:

- Full-Time ABE/GED training for up to 12 months
- Full-Time work experience for up to 9 months
- Full-Time Community Jobs participation for up to 9 months

Families That Work could be added to this short list if and when standards and outcomes are established.

Consideration and action will be taken for those families in crisis situations that will, by definition, be counted as full-time participation.

The case manager will build an IRP with the participant that specifically addresses the crisis issues. The case manager will consult with expert personnel for assistance, including social workers, tribal representatives, domestic violence case managers and others, whenever it is needed to set up specific steps the participant should take to mitigate his or her circumstances.

Issue resolution will be assigned for 30 days, with specific steps outlined as participation (e.g., contact housing organizations). The review at 30 days is to ensure that progress is being made toward resolution. If the resolution will take longer than 30 days, and the participant has performed the specified assignments, then more time may be assigned.

Crisis issue resolutions that take more than 90 days will require approval at a supervisor or higher level and should be reviewed every 30 days. The reviews are meant to ensure that participants are making progress in resolving their issues and that they have all they need in order to progress.

Conducting the specified steps on the IRP will constitute the participant's required participation until the issue is resolved and other activities can be added to the participant's IRP.

### **Family Violence**

We are not recommending a change to our policy on how to serve clients with family violence issues.

- If a client discloses family violence or family violence issues that impact his/her ability to participate, the case manager, in consultation with the social worker and/or DV counselor, will develop an IRP with the client that is tailored to the family's safety needs.
- The IRP should be as specific as possible and must be kept confidential.
- Progress will be reviewed with safety as a primary concern.

The current policy will remain in place for pregnant participants and those caring for an infant up to 12 months of age. There will be stronger efforts, as a result of the improved processes, to make sure clients are participating according to policy and are progressing toward employment and moving off of TANF.

A sub-group is doing research on the services being provided by LEP Pathway providers and will make recommendations for improvements to the Sub 3.

In addition, a workgroup will be formed, with the IPAC as the genesis, to work out the details of participation levels for tribes. Recommendations will be submitted to the Sub 3.

## **Bundling Activities**

There are part-time activities that can be options for participants to engage in when combined with other activities. The challenge is to build standards around the activities and to develop means to record and track the participation without adding unmanageable workload issues for workers.

As with the full-time activities, part-time services will be defined by strong standards, established and approved by Sub 3, that service providers will have to agree and adhere to. Service providers will be required to report to the case manager on a monthly basis that clients are participating as required.

The goal is to engage clients in meaningful activities that will lead them into employment and out of poverty. There is no advantage to clients or workers if the tracking systems and processes add unnecessary work and become cumbersome to maintain. The simpler the process, the better.

### **Quantifying Participation**

To keep the process simple, activities will be tracked by blocks of time, not actual hours of participation. This will make it much easier for case managers to build effective IRPs and it will reduce the amount of time they spend working the system, instead of letting the system work for them.

Standards for part-time activities will be developed and have time block values assigned to them. This will allow case managers to easily determine how to use the blocks to "build" a full-time IRP out of part-time activities. The blocks of time would be measured as follows:

- $\frac{3}{4}$  time
- $\frac{1}{2}$  time
- $\frac{1}{4}$  time

For example, participation in part-time training activities (ABE/GED, vocational training, short-term job skills training, life skills/parenting) will be counted on the current educational format of allowing two hours of study time for each hour in class. (Full-time education is considered 11 or more credits.)

- $\frac{3}{4}$  time = 9 or 10 credits
- $\frac{1}{2}$  time = 6 to 8 credits
- $\frac{1}{4}$  time = 1 to 5 credits

Families That Work training participation will be tracked differently than other educational activities because much more of the participation occurs in the classroom, as opposed to homework or study time. Families That Work participation will be tracked as follows:

- Under Development

As much as possible, one activity will be designated as the primary activity that a client is engaged in. This activity will be the focus for assisting the client to get a job or a better job. The primary activity will account for at least 20 hours participation. Other services and activities will be bundled to add up to full-time participation.

Current program standards will remain, unless otherwise indicated. For example, vocational education will still have to be combined with a work activity, and part-time work will still be defined as at least 20 hours per week.

### **Other Part-Time Activities**

For participants who have issues to resolve but who are able to participate in a combination of WorkFirst activities, the case manager, in consultation with appropriate service providers and/or social workers, will define participation in the following activities on the IRP. These activities will be combined with at least half-time job search or a work activity, except in extraordinary cases.

- Part-time treatment
- Counseling
- Activities to help with housing issues, legal issues, etc.
- Activities to mitigate domestic violence situations
- CPS mandated activities
- Activities to mitigate childcare issues

Job search will be at least 20 hours a week, except for those working more than 25 hours a week and seeking a better job. Participants who cannot conduct a half-time job search are probably not able to take a job, and should be conducting activities that will prepare them to enter an effective job search.

Example: Patty Ann goes to three counseling sessions a week with her teen-aged son for anger management and related family issues. Her therapist and case manager agree that the sessions should continue but that Patty Ann is at a place in her therapy that she can get and hold a job. The therapist agrees to make the sessions flexible enough to allow Patty Ann to take a full-time job. Patty Ann spends  $\frac{1}{4}$  time in counseling, so the case manager includes  $\frac{3}{4}$  time job search on her IRP and refers her to ESD.

## **Standards for Service Providers**

To ensure accountability by service providers, Sub 3 will establish strong standards for participation activities to which contractors must agree before entering into contractual arrangements or other agreements for service delivery. These standards will apply to the full-time stand-alone activities, as well as all other activities that will be conducted on a full-time or part-time basis, with the possible exception of some activities designed to assist clients deal with issues such as mental health, family violence, drug or alcohol abuse, or homelessness.

Organizations that want to be established as an authorized provider of services will be required to submit a proposal to Sub 3 for approval that shows how they will meet the standards listed below.

- The specific services they will provide that will count as full-time, ¾ time, ½ time and ¼ time participation. In addition, a detailed description of participation requirements for clients must be included.
- How they will track participant attendance for all scheduled activities
- Monthly progress reports on each participant to the case manager
- Measurable progress toward the intended goals

Proposals to be considered for implementation with the WIT improvements will be incorporated into the WorkFirst Improvement Team (WIT) implementation timelines, but service providers will also be able to submit proposals at any time after WIT implementation so they can be considered for services in the future.

## **Component Codes in JAS**

There are currently dozens of component codes, making it confusing to track and keep the JAS system up to date. Questions about the veracity of the JAS data abound. Many clients remain in components longer than they should, and it is not possible to determine actual activities because of the possible inaccuracies that exist. The system is currently labor intensive.

Overall, the recommendations fall into two categories:

- Decrease the number of components that indicate activities to a bare minimum. For example, there are currently several job search components that could be collapsed into one.
- Eliminate most referral codes, where automated systems for tracking exist. Have the case managers enter the actual activity component as soon as the client is expected to participate. This would eliminate clients staying in inactive status, overlooked in referral codes and it would require workers to engage clients or to address why they are not participating.

## **Individual Responsibility Plans**

In order to increase the effectiveness of the program and to ensure that clients are either fully engaged or in sanction status, the IRPs must be comprehensive and specific.

Special attention will be given to the standardized language that is contained in all IRPs so that it is consistent, clear and covers all the required elements. The IRP will be improved to enhance participation and add more value to participants and workers, especially in light of increased participation expectations and improved sanctioning processes.

- All IRPs should give specific instructions, including dates for showing up and expectations for participation, and explicit consequences for non-participation. Case managers will use the specific client participation requirements approved for the service providers to complete the IRP. For example, the IRPs should tell clients that they must log into the CATS system every day they are in job search.
- IRPs should outline procedures to follow if a participant cannot report as directed. For example, a specific phone number should be given on the IRP that the client should call in order to report a good



reason for not coming in, and the IRP should indicate that the call must be made on the same day that the reason occurs.

## **Monitoring Participation and Reporting to the Case Manager**

Service providers will have increased responsibility to monitor client participation and report to the case manager. To ensure clients are fully engaged and meeting the participation requirements outlined in the IRP, providers will verify participation and report to the case manager at least monthly, and sooner for non-participation, for each client. The case managers will use the information monthly to monitor progress, initiate sanctions if necessary, and to clear sanctions.

Service providers will have to agree to provide the information as required in a timely manner, and develop reporting strategies, so that the case managers can accomplish their tasks. To make the improved WorkFirst system work properly, this information becomes very important and cannot be delayed. This represents a significant change for service providers from the current standards. WorkFirst contracts will have to be amended, requiring contractors to develop a clear definition of “satisfactory WorkFirst participation” based on the standards approved by Sub 3.

As much as possible, service providers will use electronic methods to report to the case manager. This includes using e-JAS as a standard vehicle. ESD will use CATS to track and report to the case manager who can access it via e-JAS.

Three types of participation verification:

- 1) Automated monthly verification by provider through CATS or e-JAS, where available.
- 2) Written monthly verification signed by provider where e-JAS is not available, using a standard form with a release of information. Client submits the form to the case manager.
- 3) Individualized reporting agreement between the case manager and the client for special or hard-to-document cases. A standardized form will be developed.

After a designated number of unexcused absences, case managers will initiate the sanction process. Before sanctioning for non-participation, case managers will review and monitor the case notes in VIEW and e-JAS so that issues that might have contributed to the failure to participate, such as prior domestic violence situations, can be explored as potential reasons for the non-participation.

## Section

# 3

# Who Must Participate?

## Introduction

In WorkFirst, the expectation is that those who can participate must participate or face sanction. This premise is the basis for the participation expectations built into the improved standards. There are some for whom participation should not be required. Below is a description of situations that will exempt individuals from mandatory participation. For all others, WorkFirst will require participation.

Most clients will be able to participate in full-time activities defined in this document. However, there are some clients who need special consideration and accommodation to find the level of participation that best addresses their individual needs. In these cases, the case manager, in consultation with the DSHS social worker or other experts, will develop an IRP that makes the best sense for the participant, and includes activities that move the client into employment.

Example: Martin was in an accident two years ago in which he permanently damaged his left hand resulting in reduced ability to lift and carry. He is not exempt from participation as having a chronic and severe disability. However, Martin needs special consideration to find the activities that will best assist him. The case manager consults with a DVR worker, and builds an IRP that consists of participation with DVR. Even though it does not add up to 32 hours of actual time, this activity is counted as full-time participation because it is at the level that Martin can best and most effectively participate.

## Exempt from Mandatory Participation

There are a limited number of clients who are not able to or should not be required to participate. These clients will be considered exempt from mandatory participation. Clients who will be considered exempt are defined below:

- **Older caregivers** aged 55 or older.
- **Applicant for SSI** or other federal benefits who are in the SSI facilitation track.
- **Adults with disabilities** when the disability is a severe and chronic mental, physical, emotional or cognitive impairment that prevents participation in work activities and lasts at least 12 months.
- **Caring for a Child or an Adult with a Disability:** For a child with a disability, the standard is the same as the Child with Special Needs Program, when a public health nurse, physician, mental health provider, or other professional determines that the child requires specialized care or treatment that significantly interferes with the client's ability to work or look for work. For an adult with a disability, the adult with the disability must need 24-hour care; no other adult is available to provide the care; and the adult with the disability and the caregiver adult live in the same residence. For example, in a 2-parent family, the dad has had a stroke and is bedridden, or has later stage Alzheimer's and cannot be left alone, and the mother is needed in the home to provide care.

## **Documentation**

Documentation may come from a variety of sources based on the client's condition. It must be objective and from a professional, and may include medical evidence, a mental health assessment, an assessment from a Public Health Nurse, DD Case Manager, DSHS Social Worker, SSI facilitator, or case staffing history. The case manager cannot determine exemption status without the appropriate documentation.

Clients will be allowed 30 days, and up to 90 days if needed, to gather the medical/ mental health documentation for the exemption. During this period, the gathering of medical evidence will be counted as a full-time participation in the appropriate X category, and must be reviewed every 30 days to ensure the client is moving forward with the IRP requirements.

An improved form for medical evidence should be provided to specify the medical condition, the limitations on work activities, and how long the condition will last.

The exemption would apply whenever the conditions were met.

The client's exemption will be case staffed, except older caregivers, at least every 12 months to make sure the client still meets the exemption criteria. The review period could be shorter based on the client's circumstances.

## **Voluntary Participation**

Clients who are determined to be exempt from mandatory participation may voluntarily participate in part-time or full-time WorkFirst activities. WorkFirst will provide services or refer voluntary participants to other service providers to help them enhance their employability and move them into employment. For those who voluntarily participate, sanction will not be imposed for failure to participate.

## Section

# 4 What Happens if Clients Don't Participate?

## Sanction Goals

The WorkFirst partners are strengthening the sanction process to ensure it is swift, sure, and progressive. A major part of this change is to clearly define the term "sanction."

Our primary message to clients is that every failure to participate as required without good cause is a serious matter that has consequences. So, every time a client fails to participate without good cause, they will immediately enter sanction status. Even if these clients are able to cure the resulting sanction before a penalty is imposed, they will face steeper penalties and cures in the future if they enter sanction status for a second time.

At the same time, the new policy retains sanctions and cures as an important incentive for the client to immediately begin to participate and access WorkFirst services and supports that can lead to self-sufficiency.

## Recommended Sanction Process

This section describes the strengthened WorkFirst sanction process as a client moves from failure to participate to curing sanction.

### Notice of Non-Participation

- ESD will use the CATS automated system to track client participation. It will also generate a good cause letter to the client and a case manager alert via e-JAS if the client fails to participate.
- WorkFirst will make a similar automated system available to other contractors to track participation/generate good cause letters and alerts.
- When automated systems are not available, the case manager sends a good cause letter when s/he fails to receive verification of satisfactory participation.
- The good cause process can also be initiated at any time the case manager determines that there is failure to participate.

### Good Cause Notice

- Each CSO will establish a set time and day each week for clients to come in and discuss good cause with a case manager. When we learn that a client has failed to participate, the client will be sent a notice that includes a time and date for this "open sanction appointment" at the CSO. The client will also be given an opportunity to call, write, or schedule an individual appointment with her or his case manager within 10 days.

- The client has 10 days to establish good cause for failure to comply due to new circumstances. Verification may be required.
- If the client fails to show good cause within 10 days, the case manager reviews VIEW and the case notes and screens cases for potential good cause reasons, such as domestic violence, homelessness, NSA status, or disability.
- In general, good cause will not be established if a client fails to notify the service provider of new circumstance and her or his inability to comply. However, there are exceptions to this when a client is unable to contact the provider (e.g. emergent DV issues, client in the hospital, etc).
- If the client has good cause, the case manager will adjust the IRP, as needed, to meet the new circumstances.

### **Ten-Day Notice of Sanctions**

If the client does not have good cause for failure to participate as required, they will be sent a notice that describes:

- What they failed to do
- That they are in sanction status (whether or not they cure the sanction before any penalties are applied)
- Penalties that will be applied to the grant and when the penalties will be applied
- How to request a fair hearing if they disagree with the decision
- How to end the penalties and get out of sanction status
- That sanction penalties will increase the longer a client is in sanction and the more times a client is placed in sanction

### **Sanction Penalties**

The chart and examples below show the sanction penalties for clients who enter sanction status because they have failed to participate without good cause.

<b>First Time in Sanction Status Months 1-3</b>	<b>Second Time in Sanction Status Months 1-3 --OR-- Months 4-6 of 1<sup>st</sup> sanction</b>	<b>Third (or subsequent) Time in Sanction Status --OR-- Months 4-60 of 2<sup>nd</sup> sanction --OR-- Months 7-60 of 1<sup>st</sup> sanction</b>
Person's share removed from grant	Person's share removed from grant AND protective payee is assigned until sanction is cured	Person's share or 40% is removed from grant, whichever is more, AND protective payee is assigned until sanction is cured

**Example #1 (First-Time Sanction):** The client enters sanction status for the first time August 5. The case manager processes the case in ACES to begin grant reduction beginning September 1. The participant continues to be out of compliance by not participating. Beginning December 1, the protective payee would be in place. The participant continues to be out of compliance. Beginning March 1, the grant reduction would be 40% or the person's share, whichever is more.

**Example #2 (Third-Time Sanction):** The client enters sanction status for the third time November 5. The case manager processes the case in ACES to begin grant reduction December 1. The grant would be reduced by 40% or person's share whichever is more and benefits would be managed by a protective payee.

## Curing Sanctions

The chart and examples below show how sanctions are cured.

	<b>First Time in Sanction Status (on or after 7/1/02)</b>	<b>Second Time in Sanction Status</b>	<b>Third (or subsequent) Time in Sanction Status</b>
<b>Cure Time</b>	Months 1-3: 2 consecutive weeks of participation  Months 4-60: 4 consecutive weeks of participation	4 consecutive weeks of participation	4 consecutive weeks of participation

The client must do what was in her or his IRP when they entered sanction status unless her or his circumstances change and the IRP is modified.

**Example:** A client was assigned to full-time job search at the time he or she was sanctioned for non-participation. The client's circumstances did not change. To cure the sanction, the client must return to job search and participate as required.

**Example:** A client broke a leg while in sanction for not participating in job search. The IRP was modified to require doctor visits for a few weeks followed by job search.

## Effective Date of Cure

The grant is restored:

- Within 5 working days of receiving participation verification
- Effective the day the client started participating as required

**Example #1 (curing sanction during first three months of first sanction):** The client begins sanction August 1. On August 24, the client provides verification of satisfactory participation for the time period August 7 through August 21. The sanction is removed and a grant supplement issued back to August 7. The case manager authorizes the supplemental payment by August 29.

**Example #2 (curing sanction during third sanction):** The client is placed in a third sanction beginning August 1. On October 10, the client provides verification of satisfactory participation for the time period September 9 through October 4. The sanction is removed and grant supplement is issued back to September 9.

## Grandfathering Sanction Cases

All clients will be mailed a notice 45-60 days before the new sanction policy goes into effect that if s/he is in sanction status on July 1, 2002, any subsequent sanctions will be considered the second occurrence, and she or he will be subject to those penalties and cures.

**Example #1 (client enters new sanction process while in sanction)** Client has been in sanction for five months on July 1, 2002. Client will enter the new sanction process in month five of the new process which is the second month of stage 2 (grant reduced by non-compliant person's share, benefits managed by a protective payee and four-week cure period). On September 4, the client provides verification of satisfactory participation for the time period August 5 through September 1. By September 9, the case manager authorizes the grant supplement back to August 5.

On October 3, the client begins to not comply without good cause and continues to be non-compliant. This is considered the client's second sanction and would begin sanction November 1 with grant reduced by the non-compliant person's share and benefits managed by a protective payee.

**Example #2 (client enters new sanction process for the first time):** Client who has never been in sanction before begins to be non-compliant without good cause on June 15. Sanction is effective July 1. Client would enter the new sanction process with grant reduced by non-compliant person's share and a two-week cure period.

## Reapplying for TANF/SFA if Case Closed While in Sanction

The following two scenarios describe what happens if a case is terminated while a client is in sanction status and reapplies for TANF later:

- If the grant is reopened within six months, the client will still be in sanction status and penalties will be applied at the level that was in effect when their case closed.
- If the case has been closed for more than six months, the client will no longer be in sanction status.

## Long-Term Sanctions

The social worker will conduct a home visit to review the client's circumstances if s/he has been in sanction for four months without participating, unless extenuating circumstances exist. At these home visits, the social worker will:

- Determine the client is able to participate as required (If not, the case manager will be notified and the IRP modified.)
- Report to law enforcement or Child Protective Services when there is reasonable cause to believe that a child has suffered abuse or neglect
- Encourage the client to begin satisfactory WorkFirst participation

## Protective Payees

### Protective Payee Contracts

The current contract for Protective Payees will be modified to clarify the new expectations for TANF Payees. We will convene a work group to develop standards that ensure Payees can meet these new expectations. During the contracting process, TANF Payees should complete a questionnaire to screen qualifications and determine willingness to attend training and communicate with case managers about client progress. Payees will be screened and selected based on the standards developed by the work group.

New expectations of TANF Payees are:

- Increased contact with case managers through e-JAS, e-messaging
- More financial adjustments for clients who receive Child SafetyNet Payments
- Mandatory annual and on-demand training for Payees
- Annual monitoring or assessment

### **Protective Payee Plans**

The current Protective Payee Referral form and the Protective Payee Work Plan should be combined into a single form and added to e-JAS. It could then be sent to the Payee electronically. Standard language should be added to the form regarding the priority of payments to be made on behalf of TANF clients and limitations of Child SafetyNet Payments.

### **Training**

State Office staff will prepare and deliver a training package to Payees in each region. The package will include WorkFirst Policy, ethics, non-judgmental behavior, interpersonal communication, basic accounting principles, diversity and cultural awareness and confidentiality.

Training options will be offered to Payees who are unable to attend or become contractors after annual training has occurred.



## Section

# 5 What Happens After 60 Months on TANF?

## Three Extension Categories

Under Federal and State law, the State may extend TANF assistance beyond 60 months for up to 20 percent of the caseload for reason of hardship or family violence. It is up to each state to define these hardship extension categories.

On November 6th, Governor Gary Locke announced the policy for extensions based on three broad categories:

### Category 1 - Adults who are exempt from mandatory participation

See the definitions in Section 3. Clients who are exempt will be continued.

### Category 2 - Adults who are participating

Clients who are mandatory participants and are currently participating, "playing by the rules," will be extended.

#### Domestic violence:

Under federal law, this is a separate category from the other "hardships" and may allow the state to extend more than 20% of the caseload without penalty. This is a subset of the participating category.

Federal law also requires separate date reporting for family violence. Due to confidentiality issues with identifying domestic violence victims in ACES, work is still in process to identify the best data source for federal reporting.

### Category 3 - Child SafetyNet Payments

Child SafetyNet Payments are provided for the children of adults who are not participating at the 60th month. The details are explained below.

For all three categories, the requirements for participation, reporting, and eligibility will not change after 60 months except as outlined below.

## Child Safety Net Recommendations

Child SafetyNet Payments are provided for children in families where the parent has been on TANF for 60 months or more and is not participating satisfactorily.

### Child SafetyNet Payments versus Sanctions

Although the payment will be the same as at the third level of sanction (40% or the person's share, whichever is more, and be issued to a protective payee), Child SafetyNet Payments will differ from sanctions as follows:

- Child SafetyNet Payments can only be used to meet verified rent and utility costs (up to the reduced grant amount) needed to maintain housing for the children in the household.
- The parent(s) cannot receive any cash back once the rent and utility costs are paid, and any money not used in a month will be returned to the State.
- There is no ability to restore a grant while in Child SafetyNet status.

### Entering and Exiting Child SafetyNet Status

- All clients approaching the time limit will receive 45 to 60 days' notice that they will be placed in Child SafetyNet status unless they participate satisfactorily during month 60.
- After 60 months on TANF, clients who fail to participate as required, without good cause, will be placed in Child SafetyNet status.
- Clients can regain full cash benefits by participating as required. Specifically:
  - The parent can move from Child SafetyNet status to sanction status by verifying one month of satisfactory participation.
  - Once the parent transitions to sanction, the full sanction process would be in effect.
- If a client in Child SafetyNet status goes off assistance, then reapplies, the participant is still in Child SafetyNet status when the grant is reopened unless circumstances have changed significantly.

Example: A parent left TANF while in Child SafetyNet status then was in a car accident that left her with a severe and chronic disability. Upon reapplication, the parent is exempt from participation and the family receives a full TANF grant.